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7 WAYNE RUDEN

8 **UNITED STATES DISTRICT COURT**
9
10 **DISTRICT OF ARIZONA**

11
12 IN RE: BARD IVC FILTERS
PRODUCT LIABILITY LITIGATION,

13
14 THIS DOCUMENT RELATES TO:

MDL Docket No. 15-02641

15 WAYNE RUDEN,
16 C. A. No.: CV-16-00344-PHX-DGC

17 WAYNE RUDEN,
18 Plaintiff,
19 vs.
20 C.R. BARD, INC., et al.,
21 Defendants.

**DECLARATION OF GLEN TURNER
IN SUPPORT OF PLAINTIFF WAYNE
RUDEN'S MOTION FOR REMAND**

Complaint Filed: October 7, 2015

ORAL ARGUMENT REQUESTED

1 I, Glen Turner, declare as follows:

2 1. I am an attorney licensed to practice law in California. I am an attorney
3 with the law firm of Ongaro PC, attorneys of record for plaintiff Wayne Ruden in the
4 above captioned matter. I am one of the attorneys prosecuting this matter for Mr. Ruden.
5 The facts set forth herein are of my own personal knowledge and if called upon to testify,
6 I could and would do so competently. I submit this declaration in support of Mr. Ruden's
7 Motion for Remand.

8 2. I reviewed the firm's billing records and discussed their work on this matter
9 with each of our attorneys who billed to the matter. As a result of the removal,
10 Mr. Ruden's attorneys expended time which, billed at the same hourly rates that they
11 charge their product liability defense clients, amounts to the following: David Ongaro
12 expended \$2,200 worth of time, Kirsten McNelly Bibbes expended \$2,760 worth of time,
13 and Glen Turner expended \$12,600 worth of time, for a total amount of \$17,560.

14 3. Attached as **Exhibit A** is a true and correct copy of California Pacific
15 Medical Center's Opposition to Bard's Motion for Stay dated December 1, 2015, filed in
16 this matter.

17 4. Attached as **Exhibit B** is a true and correct copy of Mr. Ruden's First
18 Amended Complaint.

19 5. Attached as **Exhibit C** is a true and correct copy of C.R. Bard, Inc.'s and
20 Bard Peripheral Vascular, Inc.'s Notice of Removal.

21 I declare under the penalty of perjury under the laws of the State of California that
22 the foregoing is true and correct, and that this declaration was executed on February 9,
23 2016, in San Francisco, California.

24 

25 _____
26 Glen Turner
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of February, 2016, a copy of the foregoing was served electronically and notice of the service of this document will be sent to all parties by operation of the Court's electronic filing system to CM/ECF participants registered to receive service in this matter. Parties may access this filing through the Court's system.

/s/David R. Ongaro
David R. Ongaro